EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Ref. No
Debtors.	(Jointly Administered)
FTX TRADING LTD., et al., 1	Case No. 22-11068 (JTD)
In re:	Chapter 11

ORDER SUSTAINING DEBTORS' ONE HUNDRED FORTY-EIGHTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN NO LIABILITY PROOFS OF CLAIM (CUSTOMER CLAIMS)

Upon the one hundred forty-eighth omnibus objection (the "Objection")² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors") for entry of an order (this "Order") sustaining the Objection and disallowing and expunging in their entirety the No Liability Claims set forth in Schedule 1 and Schedule 2 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

- 1. The Objection is SUSTAINED as set forth herein.
- 2. Each No Liability Claim set forth in <u>Schedule 1</u> and <u>Schedule 2</u> attached hereto is disallowed and expunged in its entirety.
- 3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any No Liability Claim referenced or identified in the Objection that is not listed on Schedule 1 and Schedule 2 attached hereto.
- 4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' right to object on any other grounds that the Debtors discover are preserved.
- 5. To the extent a response is filed regarding any No Liability Claim, each such No Liability Claim, and the Objection as it pertains to such No Liability Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order

will be deemed a separate order with respect to each No Liability Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

- 6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.
- 7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.
- 8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

	9.	This Orde	r is immediately effective and enforceable, notwithstanding the	
possible applicability of Bankruptcy Rule 6004(h) or otherwise.				
	10.	This Cour	t shall retain jurisdiction with respect to any matters, claims,	
rights or disputes arising from or related to the Objection or the implementation of this Order.				
Dated:				
W	ilmington,	Delaware	The Honorable John T. Dorsey Chief United States Bankruptcy Judge	

SCHEDULE 1

No Liability Claims

Case 22-11068-JTD Doc 29173-2 Filed 01/08/25 Page 7 of 12

FTX Trading Ltd. 22-11068 (JTD) One Hundred Forty-Eighth Omnibus Claims Objection Schedule 1 - No Liability Claims

Asserted Claims Claim Number Tickers **Ticker Quantity** Name Debtor FTX Trading Ltd. 97184 Name on file Undetermined* Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. POC Other Crypto Assertions: MR. ABED IS A VICTIM OF A PIG 96731 Name on file FTX Trading Ltd. BUTCHERING SCAM, WE TRACED HIS STOLEN ASSETS TO YOUR EXCHANGE WHICH WERE DEPOSITED AT ####### (TRANSACTION # ID: ########) 199,900.000000000000000 Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. 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Case 22-11068-JTD Doc 29173-2 Filed 01/08/25 Page 8 of 12

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7114	Name on file	FTX Trading Ltd.		Undetermined
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7378	Name on file	have not identified any liability owing to, or FTX Trading Ltd.	ustomer entitlement of, the claimant.	Undetermine
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			LUNC	60,000.00000000000000
			SOL	175.0000000000000
			USD	950.0000000000000
			USDC	139.6000000000000
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7651	Name on file	FTX Trading Ltd.	BTC	1.0000000000000000000000000000000000000
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6795	Name on file	FTX Trading Ltd.	USD	
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96713 Name on file FTX Trading Ltd. Undetermined*

Case 22-11068-JTD Doc 29173-2 Filed 01/08/25 Page 9 of 12

Asserted Claims Claim Number Name Debtor Tickers **Ticker Quantity** Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. FTX Trading Ltd. Undetermined* Name on file Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. 97452 Name on file FTX EU Ltd. Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. Undetermined* 97340 Name on file FTX Trading Ltd. Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. FTX Trading Ltd. 8 000 0000000000000000 LISD Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. 97128 Name on file FTX Trading Ltd. LISD Undetermined* Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. USDT FTX Trading Ltd. Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. Name on file FTX Trading Ltd. CAD Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. FTX Trading Ltd Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. 97255 Name on file FTX Trading Ltd. SOL 26.4000000000000000 Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. Name on file FTX Trading Ltd. Undetermined* Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. FTX Trading Ltd. ETHBULL Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant 10.0000000000000000 Name on file FTX Trading Ltd. AAVE втс 12.0000000000000000 3.000000000000000 BULL 10.000000000000000 ETH 1 0000000000000000 FTHRUIT FTT 100.0000000000000000 LINK 30.000000000000000 USD 550.0000000000000000 Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. FTX Trading Ltd. Undetermined* Name on file Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. 97113 Name on file FTX Trading Ltd. Undetermined* Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. 97634 Name on file FTX Trading Ltd. Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant. Name on file West Realm Shires Services Inc. Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the

Undetermined*

books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

97188 Name on file FTX Trading Ltd. Undetermined*

97493

Name on file

books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

FTX Trading Ltd.

Case 22-11068-JTD Doc 29173-2 Filed 01/08/25 Page 10 of 12

			Asserted Claims	
Claim				
Number	Name	Debtor	Tickers	Ticker Quantity

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

97031	Name on file	FTX Trading Ltd.	1INCH	1.029506177576000
3,031	rune on me	T TAT TOOM & EXOL	AXS	6.190514452833973
			BTC	0.00000013048600
			DOGE	7.0000000000000000000000000000000000000
			ETH	7.506700030570240
			ETHW	0.015741333918640
			LUNA2	0.00000019502299
			MATIC	9.989982006892348
			SAND	37,742.158740000000000
			SGD	0.00000012249269
			SOL	3.022112972405158
			TRX	200.997200000000000
			USD	10.306173649272977
			USDC	136,547.720956240000000
			USDT	0.00000017429700

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

97294 Name on file FTX Trading Ltd. Undetermined*

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

SCHEDULE 2

No Liability Claims

Case 22-11068-JTD Doc 29173-2 Filed 01/08/25 Page 12 of 12

FTX Trading Ltd. 22-11068 (JTD) One Hundred Forty-Eighth Omnibus Claims Objection Schedule 2 - No Liability Claims

				Asserted Claims	
Claim					
Number	r Name	Debtor		Tickers	Ticker Quantity
96788	Name on file	FTX Trading Ltd.	BULL		1,500.00000000000000

Other Activity Asserted: 1500 units of Bitcoin - I have lost access to my account, have not received notices and could not validate my initial claim was taken into account

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

96857 Name on file FTX Trading Ltd. Undetermined

Other Activity Asserted: 5 - 500 blocks, 67.5 - 675 BTC - The FTX Miner for which I had screen shots or experienced mining full blocks as a solo miner and watching a hacker or bankman fried himself drag the blocks off of my page and they would disappear/pay elsewhere.

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

Other Activity Asserted: 367800 - Investment

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

Other Activity Asserted: 480000 - Invest

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

Other Activity Asserted: 40000 - USDT

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.